UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

FERRIS JOSEPH, Plaintiff, vs. CORPORATION OF THE PRESIDENT OF THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah corporation sole, and CORPORATION OF THE PRESIDING BISHOP OF THE CHURCH OF LATTER-DAY SAINTS, a Utah corporation sole, Defendants.	CIV. No.06-4143 **DEFENDANTS' RULE 26(a)(1) INITIAL DISCLOSURES**

Defendants Corporation of the President of the Church of Jesus Christ of Latter-Day Saints, a Utah corporation sole, and Corporation of the Presiding Bishop of the Church of Latter-Day Saints, a Utah corporation sole, , by and through its attorney, James E. McMahon of McMahon Law Office, P.C. hereby make its initial disclosures pursuant to Rule 26(a)(1):

A. The name, and if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information, are as follows:

1. Ferris Joseph
   Address unknown

   The Plaintiff has information regarding the allegations made in the Complaint.

2. Richard Joseph White
   Folsom, California

   Mr. White will dispute the fact that he ever abused the Plaintiff.

3. Donna Anne Buseman
   Address unknown.

   She is Plaintiff's sister and could have information regarding the allegations in the Complaint.

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4. Sandra Rae Joseph Cone
Chancellor, South Dakota

She is Plaintiff's sister and could have information regarding the allegations in the Complaint.

5. Donita Victoria Joseph Fox
1303 Riverside Avenue #29
Provo, Utah 84604

She is Plaintiff's sister. Plaintiff claims that he was with his sister when he suddenly remembered he had been abused.

6. Jean Joseph
Address unknown.

She is Plaintiff's sister and could have information regarding the allegations in the Complaint.

7. Randolph Raymond Joseph
Sioux Falls, South Dakota

He is Plaintiff's brother and Plaintiff alleges he was also abused.

8. Duane Nelson
Glenwood, Alberta
Canada

Plaintiff identifies Mr. Nelson as the bishop of the Glenwood Ward, Cardston Alberta Stake whom he disclosed the alleged abuse to on October 31, 2004, and thereafter counseled with Mr. Nelson regarding the alleged abuse.

9. Dianne Marie Sano
Salt Lake City, Utah

She was the Plaintiff's first wife and could have information regarding the alleged abuse.

10. Terry Marie Scott
Pinnellas Park, Florida

She was Plaintiff's second wife and could have information regarding the alleged abuse.

11. Chris Sunderland
Cardston Alberta
Canada

Mr. Sunderland is identified by the Plaintiff as a therapist for LDS whom he visited with about the alleged abuse.

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party that are relevant to disputed facts alleged with particularity in the pleadings:

The following are being produced or made available for inspection:

1. Historical membership for the Plaintiff, Ferris Joseph.

2. A map of the "Northern Indian Mission."

3. A list of "World Missions and Their Presidents Through the Years."

Defendants are not identifying or disclosing documents they have received from Plaintiff's prior counsel. Defendants are in the process of checking historical records for a Richard Joseph White who served in the Northern Indian Mission. A further search is also being conducted for additional records pertaining to the Northern Indian Mission. It is believed that any relevant documents with information regarding the Northern Indian Mission will also contain information that is confidential and not relevant to this suit. If documents containing information relevant to Plaintiff's allegations are found, they will be disclosed, subject to an appropriate protection order or redacted.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

Not applicable.

D. Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

The Defendants are self-insured for an amount far in excess of this claim.

Dated this 20th day of November, 2006.

McMAHON LAW OFFICE, P.C.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20th day of November, 2006, a true and correct copy of the foregoing *Defendants' Rule 26 Initial Disclosures* in the above-entitled matter was served by first class mail, postage prepaid and electronically filed to:

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/s/ James E. McMahon
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